IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

KIMBRA CRISWELL,	)	
	)	
Plaintiff,	)	
v.	)	C.A. No. 05-CV-00321 GMS
	)	
LYDIA ADAIR MCFADDEN and CHRISTIANA	)	
CARE HEALTH SERVICES, INC.,	)	JURY TRIAL DEMANDED
	)	
Defendants.	)	

STIPULATION TO EXTEND TIME FOR
SUBMISSION OF EXPERT REPORTS

It is stipulated by and between the attorneys for the parties in the above captioned case,

subject to the approval of the Court, that:

1.   Plaintiff's Expert report deadline has been extended to January 19, 2007.

2.   Defendants' Rebuttal reports are due no later than April 5, 2007.

3.   The grounds for this request for an extension of time are that Plaintiff's reports

were dilatory, and Defendants filed a Motion to Preclude Plaintiff from Presenting Expert

Testimony on January 9, 2007. Subsequently, the parties reached an agreement whereby

Defendants' neurologist and vocational rehabilitation experts will be permitted to examine the

Plaintiff prior to trial, in exchange for an extension of expert report deadlines. The examinations

of Plaintiff will be conducted on March 29, 2007, and rebuttal reports submitted on April 5,

2007.

4.   Mediation in this case is now scheduled for March 30, 2007.

WILDMS 142054v.1

5.   Defendants hereby withdraw their Motion to Preclude Plaintiff from Presenting

Expert Testimony filed on January 9, 2007.

RICHARD R. WIER, JR., P.A.   **WHITE and WILLIAMS LLP**

 /s/ Richard R. Wier, Jr.   */s/ Deborah J. Massaro*
Richard R. Wier, Jr. (#716)   John D. Balaguer (#2537)
Two Mill Road, Suite 200   Deborah J. Massaro (#4280)
Wilmington, DE   19806   824 North Market Street, Suite 902
(302) 888-3222   Wilmington, DE 19899
                                                  (302)467-4501
                                                  Attorneys for Defendants, Lydia Adair
                                                  McFadden and Christiana Care Health
                                                  Services, Inc.

Of Counsel:
Michael T. van der Veen, Esq.
Nelson Levin, Esq.
KATS, JAMISON, VAN DER VEEN & ASSOCIATES
25 Bustleton Pike
Featerville, PA 19053
(215)396-9001
Attorneys for Plaintiff

        SO ORDERED this _____ day of _____ 2007.

                                    _____
                                    The Honorable Gregory M. Sleet
                                    Judge, District Court for The
                                    District of Delaware

WILDMS 142054v.1